

## **REMARKS**

Upon entry of this amendment, claims 1, 11, 12, and 14-19 and are all the claims pending in the application. Claims 2-10 and 13 have been canceled by this amendment, and claims 14-19 have been added as new claims. No new matter has been added.

### **I. Objection to the Specification**

The Examiner has objected to the title of the invention as not being descriptive. Applicants have amended the title herein so as to read: PICTURE CODING METHOD FOR CODING A PROGRESSIVE PICTURE SIGNAL. Accordingly, Applicants kindly request that the Examiner reconsider and withdraw the above-noted objection.

### **II. Objection to the Drawings**

The Examiner has objected to the drawings for the reasons set forth on page 2 of the Office Action. In particular, the Examiner asserts that Fig. 2 should be labeled as "Prior Art". Applicants are submitting herewith a replacement sheet for Fig. 2 which includes the "Prior Art" label. Accordingly, Applicants kindly request that the objection be reconsidered and withdrawn.

### **III. Claim Rejection under 35 U.S.C. § 101**

Claim 13 was rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. As noted above, claim 13 has been canceled, thereby rendering this rejection moot.

#### **IV. Claim Rejections under 35 U.S.C. § 102**

A. Claim 13 was rejected under 35 U.S.C. § 102(e) as being anticipated by Cok (U.S. 2003/0016750). As noted above, claim 13 has been canceled, thereby rendering this rejection moot.

B. Claims 1-9, 11 and 12 were rejected under 35 U.S.C. § 102(e) as being anticipated by Suzuki et al. (U.S. 2002/0101924).

Claim 1, as amended, recites the features of a sampling step of sampling frames from frames in the cinema signal part in the progressive picture signal using a first method and frames from frames in the NTSC signal part in the progressive picture signal using a second method, wherein in the first method, by sampling the cinema signal part in the progressive picture signal initially at a first rate of one frame for every two frames, then at a second rate of one frame for every three frames, and then repeatedly alternating between the first rate and the second rate, a frame sequence resulting from sampling the cinema signal part is generated. Applicants respectfully submit that Suzuki does not disclose or suggest such features.

Regarding the Suzuki reference, Applicants note that this reference describes a 2:3 pulldown process which involves inserting repeat frames (e.g., A' and c' as shown in Fig. 1B), as well as an inverse 2:3 pulldown process in which the repeat frames are removed (see paragraphs [0046]-[0048]). In Suzuki, a technique is disclosed for detecting repeat frames, analyzing a pattern of the repeat frames, and deleting the repeat frames based on a result of the analysis (see Abstract).

In particular, as explained in Suzuki, a comparator 108 is provided for determining whether each field is a repeat field, and a pattern analyzing portion 110 analyzes whether the repeat fields are continuous or discontinuous (see paragraphs [0059] and [0069]). If it is determined that the repeat fields are continuous, a continuity flag of "1" is supplied to an inverse pull-down controlling portion 114, and if it is determined that the repeat field are discontinuous, a continuity flag of "0" is supplied to the pull-down controlling portion 115 (see paragraph [0114]).

When the continuity flag received from the pattern analyzing portion 110 is "1", the inverse pulldown controlling portion 114 performs the inverse 2:3 pull-down process for removing a field which is determined to be repeat field by the comparator 108 (see paragraph [0117]). On the other hand, when the continuity flag received from the pattern analyzing portion 110 is "0", the inverse pull-down controlling portion 114 does not perform the inverse 2:3 pull-down process, and therefore does not remove a field which is determined to be a repeat field by the comparator 108 (see paragraph [0017]).

Based on the foregoing description, Applicants submit that while Suzuki discloses the ability to detect repeat fields of a cinema signal part, to analyze a pattern of the repeat fields and to remove the repeat fields if a continuous pattern is detected, that Suzuki does not disclose or in any way suggest the ability to sample the cinema signal part initially at a first rate of one frame for every two frames, then at a second rate of one frame for every three frames, and then repeatedly alternating between the first rate and the second rate, so as to generate a frame sequence, as recited in amended claim 1.

In other words, Suzuki is related to the analysis of a pattern of repeat fields of a cinema signal and the removal (or non-removal) of such repeat fields based on the analysis, whereas claim 1 is related to the sampling of a cinema signal part at different rates so as to generate a frame sequence. In particular, sampling at a first rate of one frame for every two frames, then at a second rate of one frame for every three frames, and then repeatedly alternating between the first rate and the second rate.

In view of the foregoing, Applicants respectfully submit that Suzuki does not disclose, suggest or otherwise render obvious the above-noted features recited in amended claim 1. Accordingly, Applicants submit that claim 1 is patentable over Suzuki, an indication of which is kindly requested.

It is noted that by generating a frame sequence by performing the sampling as recited in amended claim 1, it is possible to minimize fluctuations in the frame update speed from a visual standpoint, thereby providing a more visually pleasing display for a user (see the specification at page 17, lines 16-20).

Regarding claim 11, Applicants note that this claim has been amended so as to recite that the sampling conversion unit is operable to sample frames from frames in the cinema signal part in the progressive picture signal by initially sampling at a first rate of one frame for every two frames, then at a second rate of one frame for every three frames, and then repeatedly alternating between the first rate and the second rate, so as to generate a frame sequence.

For at least similar reasons as discussed above with respect to claim 1, Applicants respectfully submit that Suzuki does not disclose, suggest or otherwise render obvious such a

feature. Accordingly, Applicants submit that claim 11 is patentable over Suzuki, an indication of which is kindly requested.

Regarding claim 12, Applicants note that this claim recites the features of a sampling step of sampling frames from frames in the cinema signal part in the progressive picture signal using a first method and frames from frames in the NTSC signal part in the progressive picture signal using a second method, wherein in the first method, by sampling the cinema signal part in the progressive picture signal initially at a first rate of one frame for every two frames, then at a second rate of one frame for every three frames, and then repeatedly alternating between the first rate and the second rate, a frame sequence resulting from sampling the cinema signal part is generated.

For at least similar reasons as discussed above with respect to claim 1, Applicants respectfully submit that Suzuki does not disclose, suggest or otherwise render obvious such a feature. Accordingly, Applicants submit that claim 12 is patentable over Suzuki, an indication of which is kindly requested.

#### **V. Claim Rejections under 35 U.S.C. § 103(a)**

Claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over Suzuki et al. (U.S. 2003/0101924). As noted above, claim 10 has been canceled by this amendment, thereby rendering this rejection moot.

## **VI. New Claims**

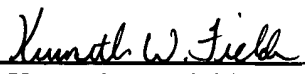
Claims 14-19 are added as new claims. Claims 14 and 15 depend from claim 1, claims 16 and 17 depend from claim 11, and claims 18 and 19 depend from claim 12. Accordingly, Applicants respectfully submit that claims 14-19 are patentable at least by virtue of their dependency.

## **VII. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may best be resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Takahiro NISHI

By:   
Kenneth W. Fields  
Registration No. 52,430  
Attorney for Applicant

KWF/jjv  
Washington, D.C. 20006-1021  
Telephone (202) 721-8200  
Facsimile (202) 721-8250  
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